

**UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION**

**ELIZABETH PROTHRO WILLIAMS,**

**Plaintiff,**

v.

**TRANS UNION LLC, and  
EXPERIAN INFORMATION  
SOLUTIONS, INC.,**

**Defendants.**

**CASE NO. \_\_\_\_\_**

**DEFENDANT EXPERIAN INFORMATION SOLUTIONS, INC.'S  
NOTICE OF REMOVAL**

Pursuant to 28 U.S.C. § 1441, Defendant Experian Information Solutions, Inc. (“Experian”) hereby files this Notice of Removal of the above-captioned action to this Court and states as follows:

1. Experian and Trans Union LLC (“Trans Union”) are named Defendants in Civil Action No. 2011-CP-40-7965 filed in the Court of Common Pleas of the Fifth Judicial Circuit, State of South Carolina, County of Richland (the “State Court Action”).

2. The Complaint in the State Court Action was filed with the Clerk of the Court of Common Pleas on November 21, 2011. Defendant Experian was the first defendant served and was served with the Complaint on December 1, 2011.

3. This Notice is being filed with this Court within thirty (30) days after Defendant Experian received a copy of Plaintiff’s initial pleading setting forth the claims for relief upon which Plaintiff’s action is based.

4. A copy of all process, pleadings, and orders served upon the Defendants in the State Court Action is attached hereto as Exhibit A.

5. Experian is a corporation which, for monetary fees, regularly engages in whole or in part in the practice of assembling consumer credit information or other information on consumers for the purpose of furnishing consumer reports to third parties. Experian uses means or facilities of interstate commerce for the purpose of preparing or furnishing consumer reports, and therefore is a "consumer reporting agency" within the meaning of 15 U.S.C. § 1681a(f).

6. Trans Union is a limited liability company which, for monetary fees, regularly engages in whole or in part in the practice of assembling consumer credit information or other information on consumers for the purpose of furnishing consumer reports to third parties. Trans Union uses means or facilities of interstate commerce for the purpose of preparing or furnishing consumer reports, and therefore is a "consumer reporting agency" within the meaning of 15 U.S.C. § 1681a(f).

7. The claims of relief against all Defendants alleged in the State Court Action arise under the Fair Credit Reporting Act, 15 U.S.C. §§ 1681-1681u. Thus, this court has original subject matter jurisdiction over the above-captioned action pursuant to 28 U.S.C. § 1331 and 15 U.S.C. § 1681p. The above-captioned action may properly be removed to this United States District Court pursuant to 28 U.S.C. § 1441(a) and (b).

8. To date, Trans Union has not been served with the Complaint. All Defendants have joined in and given their consent to this removal. A true and correct copy of Trans Union's Joinder and Consent to Removal is attached hereto as Exhibit B.

9. Promptly after the filing of this Notice of Removal, Experian shall provide notice of the removal to Plaintiff through her attorney of record in the State Court Action and to the Clerk of the Court in the State Court Action, as required by 28 U.S.C. § 1446(d).

Dated: December 30, 2011

Respectfully submitted,

**HAYNSWORTH SINKLER BOYD, P.A.**

By: /s/ Lindsey Carlberg Livingston  
Lindsey Carlberg Livingston  
Federal ID No. 9518

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*Attorneys for Defendant Experian  
Information Solutions, Inc.*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 30<sup>th</sup> day of December, 2011, I caused the foregoing to be served by first-class U.S. Mail, postage prepaid, on the service list as follows:

*/s/ Lindsey Carlberg Livingston*  
Lindsey Carlberg Livingston

**SERVICE LIST**

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